EXHIBIT 13

RBDS	DISPLAY TECHNOLOGIES	PAM	ROTHSCHILD	SAMUEL MEYLER & MEYLER LEGAL PLLC
REQUEST NO. 5: All		REQUEST NO. 7: All	REQUEST NO. 5: All	REQUEST NO. 5: All
Documents,		Documents,	Documents,	Documents,
Communications, and		Communications, and	Communications, and	Communications, and
Things Relating to any		Things Relating to any	Things Relating to any	Things Relating to any
proposed or executed		proposed or executed	proposed or executed	proposed or executed
License to, assignment		License to, assignment	License to, assignment	License to, assignment
of, or any other grant of		of, or any other grant of	of, or any other grant of	of, or any other grant of
rights to the '221 Patent,		rights to the '221 Patent,	rights to the '221 Patent,	rights to the '221 Patent,
including all offers and		including all offers and	including all offers and	including all offers and
negotiations of any such		negotiations of any such	negotiations of any such	negotiations of any such
License, assignment, or		License, assignment, or	License, assignment, or	License, assignment, or
any other grant of		any other grant of	any other grant of	any other grant of
rights.		rights.	rights.	rights.
Defendant expressly incorporates each of the		RESPONSE:	RESPONSE:	RESPONSE:
foregoing General		Defendant expressly	Defendant expressly	Defendants expressly
Objections by reference.		incorporates each of the	incorporates each of the	incorporate each of the
		foregoing General	foregoing General	foregoing General
Defendant also objects		Objections by reference.	Objections by reference.	Objections by reference.
to this Request to the				
extent it seeks		Defendant also objects	Defendant also objects	Defendants also object
documents and		to this Request to the	to this Request to the	to this Request to the
information protected		extent it seeks	extent it seeks	extent it seeks
by the attorney-client		documents and	documents and	documents and
privilege, the work		information protected	information protected	information protected
product doctrine, or any		by the attorney-client	by the attorney-client	by the attorney-client
		privilege, the work	privilege, the work	privilege, the work
		product doctrine, or any	product doctrine, or any	product doctrine, or any

other applicable	other applicable	other applicable	other applicable
privilege or immunity.	privilege or immunity.	privilege or immunity.	privilege or immunity.
Defendant also objects	Defendant also objects	Defendant also objects	Defendants also object
to this Request to the			
extent it is duplicative,			
cumulative, or	cumulative, or	cumulative, or	cumulative, or
otherwise redundant of	otherwise redundant of	otherwise redundant of	otherwise redundant of
other Requests or other			
discovery already	discovery already	discovery already	discovery already
available to Plaintiff.	available to Plaintiff.	available to Plaintiff.	available to Plaintiff.
Defendant also objects	Defendant also objects	Defendant also objects	Defendants also object
to this Request as overly			
broad and unduly	broad and unduly	broad and unduly	broad and unduly
burdensome, not	burdensome, not	burdensome, not	burdensome, not
proportional to the	proportional to the	proportional to the	proportional to the
needs of the case, and			
seeking information that	seeking information that	seeking information that	seeking information that
is not relevant to any			
party's claims or	party's claims or	party's claims or	party's claims or
defenses because it is			
unlimited in time.	unlimited in time.	unlimited in time.	unlimited in time.
Defendant also objects	Defendant also objects	Defendant also objects	Defendants also object
to this Request to the			
extent it calls for			
documents not within	documents not within	documents not within	documents not within
the possession, custody,	the possession, custody,	the possession, custody,	the possession, custody,
or control of Defendant.	or control of Defendant.	or control of Defendant.	or control of
			Defendants.
Defendant also objects	Defendant also objects	Defendant also objects	
to this Request as	to this Request as	to this Request as	

premature to the extent it seeks expert opinions, disclosures, or discovery. Defendant will provide expert opinions, disclosures, and discovery at the time(s) set by the Court's schedule for this case.

Defendant also objects to this Request as overly broad and unduly burdensome to the extent that it seeks "[a]ll Documents, Communications, and Things" and "all offers and negotiations" without further limitation or qualification. Defendant also objects to this Request as overly broad, unduly burdensome, not proportional to the needs of the case, and seeking documents that are not relevant to any party's claims or defenses to the extent it seeks documents

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unrelated to the issues		unrelated to the issues	unrelated to the issues	
				party's claims or
and/or parties involved		and/or parties involved	and/or parties involved	defenses to the extent it
in this case.		in this case.	in this case.	seeks documents
				unrelated to the issues
Subject to and without		Subject to and without	Subject to and without	and/or parties involved
waiving the foregoing		waiving the foregoing	waiving the foregoing	in this case.
objections, and to the		objections, and to the	objections, and to the	
extent documents exist		extent documents exist	extent documents exist	Subject to and without
and have not already		and have not already	and have not already	waiving the foregoing
been produced to		been produced to	been produced to	objections, and to the
Plaintiff, Defendant will		Plaintiff, Defendant will	Plaintiff, Defendant will	extent documents exist
produce and/or make		produce and/or make	produce and/or make	and have not already
available for inspection		available for inspection	available for inspection	been produced to
at a mutually-agreeable		at a mutually-agreeable	at a mutually-agreeable	Plaintiff, Defendants
place and time any		place and time any	place and time any	will produce and/or
responsive, relevant,		responsive, relevant,	responsive, relevant,	make available for
non-privileged		non-privileged	non-privileged	inspection at a
documents in its		documents in its	documents in its	mutually-agreeable
possession, custody, or		possession, custody, or	possession, custody, or	place and time any
control that can be		control that can be	control that can be	responsive, relevant,
located after a		located after a	located after a	non-privileged
reasonable search and		reasonable search and	reasonable search and	documents in their
that are proportional to		that are proportional to	that are proportional to	possession, custody, or
the needs of the case.		the needs of the case.	the needs of the case.	control that can be
the needs of the ease.		the needs of the ease.	the needs of the case.	located after a
				reasonable search and
				that are proportional to the needs of the case.
				the needs of the case.
	DECLIECT NO. 5. A 11	DEOLIECT NO. 0. A 11	DECLIECT NO. C. A11	DECLIECT NO. C. A11
	REQUEST NO. 5: All	REQUEST NO. 8: All	REQUEST NO. 6: All	REQUEST NO. 6: All
	Documents,	Documents,	Documents,	Documents,
	Communications, and	Communications, and	Communications, and	Communications, and
	Things Relating to any	Things Relating to any	Things Relating to any	Things Relating to any

proposed or executed License to, assignment of, or any other grant of rights to the '723 Patent, including all offers and negotiations of any such License, assignment, or any other grant of rights.

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RESPONSE:

Defendant expressly incorporates each of the foregoing General foregoing General Objections by reference.

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RESPONSE:

Defendant also objects to this Request to the extent it seeks documents and information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege or immunity.

Defendant also objects to this Request to the extent it is duplicative, cumulative, or otherwise redundant of

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other Requests or other discovery already available to Plaintiff.

Defendant also objects to this Request as overly broad and unduly burdensome, not proportional to the needs of the case, and seeking information that is not relevant to any party's claims or defenses because it is unlimited in time.

Defendant also objects to this Request to the extent it calls for documents not within the possession, custody, or control of Defendant.

Defendant also objects to this Request as premature to the extent it seeks expert opinions, disclosures, or discovery. Defendant will provide expert opinions, disclosures, and discovery at the time(s) set by the

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and have not already been produced to Plaintiff, Defendant will produce and/or make available for inspection at a mutually-agreeable place and time any responsive, relevant, non-privileged documents in its possession, custody, or control that can be located after a reasonable search and that are proportional to the needs of the case.

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